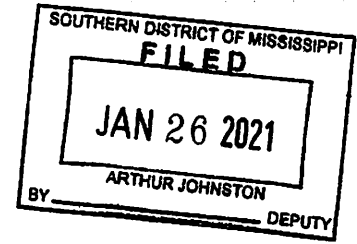


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. *3:21-cr-7-HTW-FKB*

JON DARRELL SEAWRIGHT

18 U.S.C. § 157

The Grand Jury charges:

GENERAL ALLEGATIONS

1. Defendant **JON DARRELL SEAWRIGHT** (“SEAWRIGHT”) is a resident of Mississippi whose primary place of business is in Jackson, Hinds County, Mississippi.

2. **ALEXANDER SEAWRIGHT PETROENERGY TRANSPORTATION LLC** is a Mississippi Limited Liability Company wholly owned by defendant **JON DARRELL SEAWRIGHT**, and his partner, **TED BRENT ALEXANDER**, with offices in 4247 Crane Boulevard, Jackson, Mississippi. At various relevant times, **ALEXANDER SEAWRIGHT PETROENERGY TRANSPORTATION LLC** has also been known as and done business as **ALEXANDER SEAWRIGHT TRANSPORTATION LLC** and through an affiliated company, **AST LOGISTICS, LLC**.

3. The business of **ALEXANDER SEAWRIGHT TRANSPORTATION LLC** centered on trucking, and **ALEXANDER SEAWRIGHT TRANSPORTATION LLC** could not stay in business and make money without insurance for its cargos and insurance for its trucks. Without property damage insurance coverage, **ALEXANDER SEAWRIGHT TRANSPORTATION LLC** would be unable to operate its tractors and trailers in interstate commerce.

COUNT 1


(Bankruptcy Filing in Furtherance of a Fraud: 18 U.S.C. § 157)

4. On or about January 18, 2019, in Hinds County and in Madison County in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **JON DARRELL SEAWRIGHT**, aided and abetted by others known and unknown to the Grand Jury, with the intent to devise a scheme and artifice to defraud insurers and financiers of insurance, and thereby to induce the insurers and financiers to obtain, issue and continue policies of insurance for ALEXANDER SEAWRIGHT TRANSPORTATION LLC, and for the purpose of executing and concealing such scheme and artifice, made a false and fraudulent representation, claim, and promise concerning and in relation to a proceeding under Title 11, United States Code, to wit, on January 18, 2019, at 3:30 p.m., **JON DARRELL SEAWRIGHT** signed and emailed to an insurance agent a completed Insurance Proposal stating that “there are no pending or anticipated bankruptcy, receivership or insolvency proceedings involving” the insured company ALEXANDER SEAWRIGHT TRANSPORTATION LLC, and “there are no known or anticipated circumstances which will impair” ALEXANDER SEAWRIGHT TRANSPORTATION LLC’s “ability to fulfill its obligations under” its insurance contract, when, as defendant **JON DARRELL SEAWRIGHT** then and there knew, a Petition for Bankruptcy had been filed on that date, January 18, 2019, at 11:13 a.m., and that Petition was signed on January 18, 2019, by **JON DARRELL SEAWRIGHT** on behalf of ALEXANDER SEAWRIGHT TRANSPORTATION LLC, all in violation of Title 18, United States Code, Sections 157 and 2.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offense, including but not limited to all proceeds obtained directly or indirectly from the offense, and all property used to facilitate the offense. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(b); and Title 28, United States Code, Section 2461.


DARREN J. LAMARCA
Acting United States Attorney

A TRUE BILL:
S/SIGNATURE REDACTED
Foreperson of the Grand Jury

This Indictment was returned in open court by the foreperson or deputy foreperson of the Grand Jury on this the 26th day of January, 2021.


UNITED STATES MAGISTRATE JUDGE